

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No. 2:24cv1305

\$485,476.00 IN UNITED STATES
CURRENCY,

Defendant.

MOTION TO STAY

AND NOW comes the United States of America, by and through its attorneys, Troy Rivetti, Acting United States Attorney for the Western District of Pennsylvania, and Jill L. Locnikar, Assistant United States Attorney, and pursuant to 18 U.S.C. § 981(g)(1), respectfully moves the Court to stay this civil action, and in support thereof avers as follows:

1. The United States instituted this civil action by filing a Verified Complaint in Forfeiture against \$485,476.00 in United States currency, delineated by asset identification number 24-CBP-000455 (the “Defendant Currency”) pursuant to 8 U.S.C. § 1324(b) and 18 U.S.C. § 981(a)(1)(C).

2. Pursuant to 18 U.S.C. § 981(g)(1), upon motion of the United States, the Court shall stay a civil forfeiture proceeding if civil discovery will adversely affect the ability of the Government to conduct a related criminal investigation or prosecution of a related criminal case.

3. The United States avers that a criminal case directly related to this civil forfeiture action remains ongoing.

4. Accordingly, this civil forfeiture action should be stayed and administratively closed in order not to compromise the ongoing criminal case.

WHEREFORE, the United States respectfully requests that this Honorable Court stay the civil forfeiture action against the Defendant Property at Civil Action No. 2:24cv1305 to protect the ongoing criminal case.

Respectfully submitted,

TROY RIVETTI
Acting United States Attorney

/s/ Jill L. Locnikar
JILL L. LOCNIKAR
Assistant U.S. Attorney
Joseph F. Weis, Jr. U.S. Courthouse
700 Grant Street, Suite 4000
Pittsburgh, PA 15219
(412)894-7429
(412)644-6995 (fax)
jill.locnikar@usdoj.gov
PA ID No. 85892

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within United States' Motion to Stay was mailed postage prepaid, certified mail, return receipt on this 17th day of April, 2025, upon the following:

Dustin Long Nguyen
7011 Lark Place
Philadelphia, PA 19153

/s/ Jill L. Locnikar
JILL L. LOCNIKAR
Assistant U.S. Attorney
Joseph F. Weis, Jr. U.S. Courthouse
700 Grant Street, Suite 4000
Pittsburgh, PA 15219
(412)894-7429
(412)644-6995 (fax)
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